

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

M. DIANE KOKEN, in her official capacity as
Insurance Commissioner of the Commonwealth
of Pennsylvania, as Liquidator of RELIANCE
INSURANCE COMPANY (IN LIQUIDATION)

Plaintiff,

v.

GPC INTERNATIONAL, INC.

Defendant.

C.A. No. 05-223 (SLR)

GPC INTERNATIONAL, INC.

Third-Party Plaintiff,

v.

ZURICH-AMERICAN INSURANCE
COMPANY

Third-Party Defendant.

SECOND AMENDING SCHEDULING ORDER

WHEREAS, Defendant and Third-Party Plaintiff GPC International, Inc. has moved pursuant to Rules 6(b) and 16(b), Fed. R. Civ. P., for a Second Amended Scheduling Order, extending thereby the current deadlines in the Court's Order dated August 16, 2005, as amended, in part, by a Stipulation and Order dated February 17, 2006 (D.I. 33)

IT IS HEREBY ORDERED that the deadlines for the matters identified below are extended to the following dates:

1. **Discovery.**

a. Discovery will be needed on the following subjects: **policies, claims (including the handling thereof), retrospective premium calculations, retrospective premium analysis and correspondence.**

b. All fact discovery shall be commenced in time to be completed by **August 15, 2006** (as adjourned from May 15, 2006 (originally March 16, 2006)). All expert discovery shall be commenced in time to be completed by **October 31, 2006** (as adjourned from June 14, 2006 (originally April 14, 2006)).

c. Maximum of **25** interrogatories by each party to any other party.

d. The number of requests for admission by each party to any other party **will be in accordance with local Rule 26.1(b).**

e. Maximum of **7** depositions by plaintiff and **7** each by defendant and third-party defendant.

f. Each deposition limited to a maximum of **7** hours unless extended by agreement of the parties.

g. Reports from retained experts under Rule 26(a)(2) on issues for which any party has the burden of proof due by **September 8, 2006** (as adjourned from May 1, 2006 (originally March 1, 2006)). Rebuttal expert reports due by **October 6, 2006** (as adjourned from May 20, 2006 (originally March 1, 2006)).

h. **Discovery Disputes.** Any discovery dispute shall be submitted to the Court pursuant to Fed. R. Civ. P. 37. During the course of discovery, each party is limited to **two (2)** Rule 37 motions. The Court shall make itself available, however, to resolve through a

telephone conference, disputes that arise during the course of a deposition and disputes related to entry of a protective order.

2. **Applications by Motion.** Any application to the Court shall be by written motion filed with the clerk. Unless otherwise requested by the Court, counsel shall not deliver copies of papers or correspondence to chambers. **Any non-dispositive motion shall contain the statement required by D. Del. LR 7.1.1.**

3. **Motions in Limine.** All motions *in limine* shall be filed on or before **November 7, 2006** (as adjourned from the originally scheduled date of August 8, 2006). All responses to said motions shall be filed on or before **November 14, 2006** (as adjourned from the originally scheduled date of August 15, 2006).

4. **Pretrial Conference.** A pretrial conference will be held on **Tuesday, November 21, 2006** (as adjourned from the originally scheduled date of August 22, 2006), at 4:30 p.m., in courtroom 6B, sixth floor, Federal Building, 844 King Street, Wilmington Delaware. The Federal Rules of Civil Procedure and D. Del. LR 16.4 shall govern the pretrial conference. At the pretrial conference, the Court and counsel for the parties will discuss whether the claims of any party are appropriate for resolution by way of summary judgment.

5. **Trial.** This matter is scheduled for a bench trial commencing on **December 4, 2006** (as adjourned from the originally scheduled date of September 5, 2006), in courtroom 6B, sixth floor, Federal Building, 844 King Street, Wilmington Delaware. For purposes of completing pretrial preparations, the parties should plan on being allocated a total number of hours in which to present their respective cases.

Dated: June __, 2006

United States District Judge